

REMARKS

Claims 1-16 remain pending in this application. Claims 1-16 are rejected. Claims 1, 5, 9, and 13 are amended herein to place them in better form.

Claims 1-5 and 9-13 have been rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Publication No. 2002/0143776 (Hirose et al.).

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *See Verdegaal Brothers Inc. v. Union Oil Company of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Claim 1 recites a conversation control system. In contrast, Hirose et al. is not directed to a conversation control system since Hirose et al. does not have any conversation occurring that involves the user. Also, Hirose et al. does not disclose the retrieval of a reply sentence, as recited in claim 1, since Hirose et al. is retrieving lists of key words and object names (see, e.g., Figure 19 of Hirose et al). Additionally, Hirose et al. does not disclose a conversation database configured to store pieces of second morpheme information and a plurality of reply sentences which are associated with the pieces of second morpheme information, as recited in claim 1. In fact, Hirose et al. is not even directed to outputting of sentences. Hirose et al. is directed to searching for key words and object names and there is no relationship between pieces of second morpheme information and reply sentences. Also, for at least the same reasons, Hirose et al. also fails to

disclose a reply retrieval unit configured to retrieve, based on the piece of second morpheme information searched at the topic search unit, a reply sentence associated with the piece of second morpheme information, as recited in claim 1. Also, paragraphs 0085, 0116, and 0119-0132 of Hirose et al. are directed with linking and do not disclose the retrieval of any reply sentences. Also, the second morpheme information is not the same as the reply sentences and it appears that the Office Action may be treating them as being the same in regards to Hirose et al. Additionally, paragraphs 0057 and 0072-0080 of Hirose et al. pertain to storage of objects and modification of objects and do not deal with retrieval of reply sentences.

The technical differences between the claimed invention and Hirose et al. are at least the following: (1) the claimed invention is directed to a conversation control system which retrieves a reply sentence in response to input information received from a user; and (2) Hirose et al. focuses on a knowledge information managing apparatus which outputs information (a list of keywords and the frequency of appearance of the keywords) about a desired dialogue stream and a desired object which are related to each other in response to a related information acquiring request. Thus, Hirose et al. and the claimed invention are directed to different purposes which are obtained differently and the claims of the present application reflect such distinguishing characteristics over Hirose et al.

Accordingly, for at least the aforementioned reasons, claim 1 is patentable over Hirose et al.

Regarding claim 2, Hirose et al. fails to disclose a determination of a type of input including affirmation or negation, as recited in claim 2. Hirose et al. is merely a search operation and there is no such thing as a type of input since all the input is treated the same in that if a word is provided, it will be searched no matter what word it is. Hirose et al. also fails to disclose that the pieces of second morpheme information are each associated with a plurality of reply sentences, as recited in claim 2. Hirose et al. is not directed to outputting of sentences or of even searching for sentences since it searches words. There is no disclosure in Hirose et al. of the reply sentences being associated with types of response, as recited in claim 2, since the type of response is irrelevant. Moreover, there is no analysis in Hirose et al. of particular sentences and no association of a particular reply sentence with a type of response. Also, Hirose et al. fails to disclose retrieving a reply sentence associated with the retrieved type of response, as recited in claim 2. The results of the search in Hirose et al. are lists of words and lists of objects, but no sentences are retrieved and especially no reply sentence associated with any type of response is retrieved. Also, paragraph 0177 of Hirose et al. pertains to generating key words and not to determining a type of input and paragraph 0219 of Hirose et al. pertains to examining periods and not to determining a type of input. Also, paragraph 0185 of Hirose et al. pertains to

breaking up sentences and not to associating pieces of second morpheme information with reply sentences.

Regarding claim 3, there is no comparison of first morpheme information with pieces of topic identification information to identify a topic (as recited in claim 3) in Hirose et al. The searching in Hirose et al. is based on words, not on topics. Hirose et al. fails to disclose that pieces of second morpheme information are each associated with the reply sentences since the searching in Hirose et al. is for words and objects, not sentences. Also, paragraph 0085 of Hirose et al. pertains to storing information and paragraphs 0116 and 0119-0132 of Hirose et al. pertain to data entry and therefore they do not show anything about a search or about any comparison with topic identification information. Also, paragraph 0185 of Hirose et al. pertains to breaking up sentences and not to associating pieces of second morpheme information with reply sentences.

Regarding claim 4, Hirose et al. fails to disclose a supplementation unit configured to add the piece of topic identification information to the first morpheme information, as recited in claim 4. Hirose et al. fails to disclose any topic identification information and it also does not disclose the addition of any topic identification information to any first morpheme information. Hirose et al. is merely doing a word search. Also, Hirose et al. fails to disclose what happens when no piece of second morpheme information corresponding to the extracted first morpheme information can be searched, as recited in claim 4. Also, the

objective in Hirose et al. is to find particular words. If a word is not found, there is no reason for Hirose et al. to try to find another word instead of the word that was being searched since the objective is to find certain words. In fact, if the invention of Hirose et al. were to change the search parameters, this would make the retrieval in Hirose et al. problematic because the user would get search results that are different than what was requested. Also, paragraph 0177 and paragraph 0233 and paragraph 0073 of Hirose et al. fail to disclose what happens when no piece of second morpheme information can be searched.

Regarding claim 5, the recitation of a ranking unit configured to perform ranking according to the frequency of search of a piece of second morpheme information at the topic search unit, as recited in claim 5, is not disclosed in Hirose et al. Hirose et al. does not disclose doing any kind of ranking based on the frequency that a term is searched during different searches. Also, Hirose et al. fails to disclose the pieces of second morpheme information each being associated with a plurality of reply sentences, as recited in claim 5, since Hirose et al. searches words, not sentences. Additionally, Hirose et al. fails to disclose comparing the priority levels associated with the reply sentences with the rank determined at the ranking unit, as recited in claim 5. Also, Hirose et al. fails to retrieve a reply sentence associated with any priority level, as recited in claim 5, since Hirose et al. is not retrieving sentences. Also, in paragraph 0258 of Hirose et al., there is no disclosure of any ranking based on the frequency of a search and

in paragraph 0189 of Hirose et al. there is no ranking being done. Additionally, paragraph 0185 in Hirose et al. pertains to breaking up sentences and not to associating pieces of second morpheme information with reply sentences. Also, in paragraph 0258 of Hirose et al. there is no comparison of priority levels and rank.

Claim 9 recites a conversation control method. In contrast, Hirose et al. is not directed to a conversation control method since Hirose et al. does not have any conversation occurring that involves the user. Also, Hirose et al. does not disclose the retrieval of a reply sentence, as recited in claim 9, since Hirose et al. is retrieving lists of key words and object names (see, e.g., Figure 19 of Hirose et al). Additionally, Hirose et al. does not disclose a reply sentence associated with the piece of second morpheme information, as recited in claim 9. In fact, Hirose et al. is not even directed to outputting of sentences. Hirose et al. is directed to searching for key words and object names and there is no relationship between pieces of second morpheme information and reply sentences. Also, for at least the same reasons, Hirose et al. also fails to disclose a the retrieval of a reply sentence associated with the piece of second morpheme information, as recited in claim 9. Also, paragraphs 0085, 0116, and 0119-0132 of Hirose et al. are directed with linking and do not disclose the retrieval of any reply sentences. Also, the second morpheme information is not the same as the reply sentences and it appears that the Office Action may be treating them as being the same in regards

to Hirose et al. Additionally, paragraphs 0057 and 0072-0080 of Hirose et al. pertain to storage of objects and modification of objects and do not deal with retrieval of reply sentences.

The technical differences between the claimed invention and Hirose et al. are at least the following: (1) the claimed invention is directed to a conversation control method which retrieves a reply sentence in response to input information received from a user; and (2) Hirose et al. focuses on a knowledge information managing apparatus which outputs information (a list of keywords and the frequency of appearance of the keywords) about a desired dialogue stream and a desired object which are related to each other in response to a related information acquiring request. Thus, Hirose et al. and the claimed invention are directed to different purposes which are obtained differently and the claims of the present application reflect such distinguishing characteristics over Hirose et al.

Accordingly, for at least the aforementioned reasons, claim 9 is patentable over Hirose et al.

Regarding claim 10, Hirose et al. fails to disclose a determination of a type of input including affirmation or negation. Hirose et al. is merely a search operation and there is no such thing as a type of input since all the input is treated the same in that if a word is provided, it will be searched no matter what word it is. Hirose et al. also fails to disclose that the pieces of second morpheme information are each associated with a plurality of reply sentences. Hirose et al.

is not directed to outputting of sentences or of even searching for sentences since it searches words. There is no disclosure in Hirose et al. of the reply sentences being associated with types of response, as recited in claim 10, since the type of response is irrelevant. Moreover, there is no analysis in Hirose et al. of particular sentences and no association of a particular reply sentence with a type of response. Also, Hirose et al. fails to disclose retrieving a reply sentence associated with the searched type of response, as recited in claim 10. The results of the search in Hirose et al. are lists of words and lists of objects, but no sentences are retrieved and especially no reply sentence associated with any type of response is retrieved. Also, paragraph 0177 of Hirose et al. pertains to generating key words and not to determining a type of input and paragraph 0219 of Hirose et al. pertains to examining periods and not to determining a type of input. Also, paragraph 0185 of Hirose et al. pertains to breaking up sentences and not to associating pieces of second morpheme information with reply sentences.

Regarding claim 11, there is no comparison of first morpheme information with pieces of topic identification information to identify a topic (as recited in claim 11) in Hirose et al. The searching in Hirose et al. is based on words, not on topics. Hirose et al. fails to disclose that pieces of second morpheme information are each associated with the reply sentences since the searching in Hirose et al. is for words and objects, not sentences. Also, paragraph 0085 of Hirose et al. pertains to storing information and paragraphs 0116 and 0119-0132 of Hirose et

al. pertain to data entry and therefore they do not show anything about a search or about any comparison with topic identification information. Also, paragraph 0185 of Hirose et al. pertains to breaking up sentences and not to associating pieces of second morpheme information with reply sentences.

Regarding claim 12, Hirose et al. fails to disclose adding the piece of topic identification information to the first morpheme information, as recited in claim 12. Hirose et al. fails to disclose any topic identification information and it also does not disclose the addition of any topic identification information to any first morpheme information. Hirose et al. is merely doing a word search. Also, Hirose et al. fails to disclose what happens when no piece of second morpheme information corresponding to the extracted first morpheme information can be searched, as recited in claim 12. Also, the objective in Hirose et al. is to find particular words. If a word is not found, there is no reason for Hirose et al. to try to find another word instead of the word that was being searched since the objective is to find certain words. In fact, if the invention of Hirose et al. were to change the search parameters, this would make the retrieval in Hirose et al. problematic because the user would get search results that are different than what was requested. Also, paragraph 0177 and paragraph 0233 and paragraph 0073 of Hirose et al. fail to disclose what happens when no piece of second morpheme information can be searched.

Claim 13 recites performing ranking according to the frequency of search of a piece of second morpheme information at the topic search unit. Hirose et al. does not disclose or suggest doing any kind of ranking based on the frequency that a term is searched during different searches. Also, Hirose et al. fails to disclose the pieces of second morpheme information each being associated with a plurality of reply sentences, as recited in claim 13, since Hirose et al. searches words, not sentences. Additionally, Hirose et al. fails to disclose comparing the priority levels associated with the reply sentences with a determined rank, as recited in claim 13. Also, Hirose et al. fails to retrieve a reply sentence associated with any priority level, as recited in claim 13, since Hirose et al. is not retrieving sentences. Also, in paragraph 0258 of Hirose et al., there is no disclosure of any ranking based on the frequency of a search and in paragraph 0189 of Hirose et al. there is no ranking being done. Additionally, paragraph 0185 in Hirose et al. pertains to breaking up sentences and not to associating pieces of second morpheme information with reply sentences. Also, in paragraph 0258 of Hirose et al. there is no comparison of priority levels and rank.

Accordingly, for at least the aforementioned reasons, claims 1-5 and 9-13 are patentable over Hirose et al. and notice to that effect is respectfully requested. Claims 2-5 and 10-13 are also patentable at least for the reason that they depend from a patentable base claim. *See In re Royka and Martin*, 180 USPQ 580, 583 (CCPA 1974).

Claims 6-8 and 14-16 have been rejected under 35 U.S.C. § 103(a) as obvious over Hirose et al. in view of U.S. Patent No. 6,411,924 (de Hita et al.).

Claim 6 recites the lack of a retrieval of a reply sentence when the rank is the lowest. In Hirose et al. the objective is to do a word search and if a word is inputted, the search results for that word are found. One of ordinary skill in the art would have no reason to omit search results for that word since that is what is being searched. Thus, there is no reason to modify Hirose et al. in view of de Hita et al. as stated in the Office Action.

Claim 7 recites, *inter alia*, associating information as superordinate concepts or subordinate concepts. In Hirose et al., a word search is done and there is no need to associate information as superordinate concepts or subordinate concepts. Thus, there is no reason to modify Hirose et al. in view of de Hita et al. as stated in the Office Action.

Claim 8 recites that the pieces of topic information are associated with one another in predetermined relationships as superordinate concepts or subordinate concepts. In Hirose et al. there is no topic identification and therefore there is no reason for one of ordinary skill in the art to modify Hirose et al. for the pieces of topic information to be associated with one another in predetermined relationships as superordinate concepts or subordinate concepts. Thus, there is no reason to modify Hirose et al. in view of de Hita et al. as stated in the Office Action.

Claim 14 recites the lack of a retrieval of a reply sentence when the rank is the lowest. In Hirose et al. the objective is to do a word search and if a word is inputted, the search results for that word are found. One of ordinary skill in the art would have no reason to omit search results for that word since that is what is being searched. Thus, there is no reason to modify Hirose et al. in view of de Hita et al. as stated in the Office Action.

Claim 15 recites, *inter alia*, associating information as superordinate concepts or subordinate concepts. In Hirose et al., a word search is done and there is no need to associate information as superordinate concepts or subordinate concepts. Thus, there is no reason to modify Hirose et al. in view of de Hita et al. as stated in the Office Action.

Claim 16 recites that the pieces of topic information are associated with one another in predetermined relationships as superordinate concepts or subordinate concepts. In Hirose et al. there is no topic identification and therefore there is no reason for one of ordinary skill in the art to modify Hirose et al. for the pieces of topic information to be associated with one another in predetermined relationships as superordinate concepts or subordinate concepts. Thus, there is no reason to modify Hirose et al. in view of de Hita et al. as stated in the Office Action.

Accordingly, at least for the aforementioned reasons, claims 6-8 and 14-16 are patentable over Hirose et al. in view of de Hita et al. Claims 6-8 and 14-16

are also patentable at least for the reason that they depend from a patentable base claim. *See In re Fine*, 5 USPQ2d 1596, 1600 (Fed. Cir. 1988).

Applicants respectfully request a one month extension of time for responding to the Office Action. **The fee of \$120.00 for the extension is provided for in the charge authorization presented in the PTO Form 2038, Credit Card Payment form, provided herewith.**

If there is any discrepancy between the fee(s) due and the fee payment authorized in the Credit Card Payment Form PTO-2038 or the Form PTO-2038 is missing or fee payment via the Form PTO-2038 cannot be processed, the USPTO is hereby authorized to charge any fee(s) or fee(s) deficiency or credit any excess payment to Deposit Account No. 10-1250.

In light of the foregoing, the application is now believed to be in proper form for allowance of all claims and notice to that effect is earnestly solicited.

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